

EXHIBIT 7
BRADLEY
TRANSCRIPT

[Page 1]
February 28, 2024

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

- - - - -x

KEVIN CAMPBELL,

Plaintiff,

-against-

DOCKET NO:
22 CV 7662 (DLI) (MMH)

FEDERAL EXPRESS CORPORATION a/k/a FEDEX EXPRESS
and ERIC WARNDERS, INDIVIDUALLY,
Defendants.

- - - - -x

Lexitas-LegalView
Videoconference

February 28, 2024
10:07 a.m.

DEPOSITION of MICHAEL BRADLEY, the
Witness herein, held via videoconference at the
above-mentioned time, pursuant to Notice, before
Joanna Bojaryn, a Notary Public in and for the
State of New York.

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A P P E A R A N C E S:

MASSIMI LAW PLLC

Attorneys for Plaintiff

99 Wall Street

New York, New York 10005

BY: JESSICA MASSIMI, ESQ.

(VIA VIDEOCONFERENCE)

GABRIEL McGAHA, ESQ.

Senior Counsel for FedEx Express

3620 Hacks Cross Road - building B

Memphis, Tennessee 38125

(VIA VIDEOCONFERENCE)

A L S O P R E S E N T:

SHARON DANIEL

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IT IS HEREBY STIPULATED AND AGREED, by
and between the attorneys for the respective
parties hereto, that the filing, sealing and
certification of the within deposition shall be
and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED
that all objections, except as to form of the
question, shall be reserved to the time of the
trial;

IT IS FURTHER STIPULATED AND AGREED
that the within deposition may be signed before
any Notary Public with the same force and effect
as if signed and sworn to before the Court.

IT IS FURTHER STIPULATED AND AGREED
by and between counsel for all parties present
that pursuant to C.P.L.R. section 3113(d) this
deposition is to be conducted by videoconference,
that the court reporter, all counsel, and the
witness are all in separate remote locations and

(1)
(2) participating via videoconference (LegalView/Zoom)
(3) meeting under the control of Lexitas Court
(4) Reporting Service, that the officer administering
(5) the oath to the witness need not be in the place
(6) of the deposition, and the witness shall be sworn
(7) in remotely by the court reporter after
(8) confirming the witness' identity, that this
(9) videoconference will not be recorded in any
(10) manner, and that any recording without the
(11) express written consent of all parties shall be
(12) considered unauthorized, in violation of law, and
(13) shall not be used for any purpose in this
(14) litigation or otherwise.

(15)
(16) IT IS FURTHER STIPULATED that exhibits may be
(17) marked by the attorney presenting the exhibit to
(18) the witness, and that a copy of any exhibit
(19) presented to a witness shall be emailed to or
(20) otherwise in possession of all counsel prior to
(21) any questioning of a witness regarding the
(22) exhibit in question. All parties shall bear
(23) their own costs in the conduct of this deposition
(24) by videoconference, notwithstanding the
(25) obligation by C.P.L.R. to supply a copy of the

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(1)
(2) transcript to the deposed party by the taking
(3) party in civil litigation matters.
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(2) M I C H A E L B R A D L E Y,
(3) the Witness herein, having been duly sworn by the
(4) Notary Public, was examined and testified as
(5) follows:

(6) EXAMINATION BY
(7) JESSICA MASSIMI, ESQ.:

(8) Q State your name for the record,
(9) please.

(10) A Michael Bradley.

(11) Q State your address for the record,
(12) please.

(13) A 7301 Grand Avenue, 2nd floor, Maspeth,
(14) New York 11378.

(15) Q Good morning, Mr. Bradley. My name is
(16) Jessica Massimi, I'm an attorney, I represent the
(17) plaintiff, Kevin Campbell, in a case that we are
(18) here to discuss today.

(19) Have you ever been deposed before?

(20) A No.

(21) Q Have you ever testified in court?

(22) A No.

(23) Q Have you ever testified under oath
(24) before today?

(25) A No.

(1) **MICHAEL BRADLEY**

(2) Q The purpose of this deposition is for me
(3) to ask you questions about the incidents giving
(4) rise to this lawsuit. I will ask a series of
(5) questions and the court reporter will take down
(6) my questions, your answers and anything else that
(7) gets said on the record.

(8) **A Okay.**

(9) Q Because the court reporter has to take
(10) down everything that's getting said, this is not
(11) like a normal conversation so even if you can
(12) anticipate what my question is going to be, you
(13) have to let me finish my complete question before
(14) you begin to answer, because the court reporter
(15) can't take down two people speaking at once and
(16) she needs to get my complete question and your
(17) complete answer, does that make sense?

(18) **A Yes, Ma'am.**

(19) Q For the same reason, we both have to
(20) speak up and speak clearly so that the court
(21) reporter can hear us. It will speed things
(22) along. I should say if we are not speaking up
(23) it's certainly going to delay things, because we
(24) are going to have to have each other repeat
(25) stuff. We need to keep our voices up. You can't

(1) MICHAEL BRADLEY
(2) answer questions with nods or shakes of the head
(3) or saying uh-huh, uh-uh or using gestures because
(4) the court reporter can't interpret that for the
(5) record so your answers have to be verbal. Do you
(6) understand that?

(7) **A Yes.**

(8) Q If you need a break at any point, that's
(9) fine, I just ask that you answer any pending
(10) question before you step out. Meaning, if I have
(11) asked a question, I ask that you answer before
(12) you take a break. Does that make sense?

(13) **A Yes.**

(14) Q If you realize during the deposition
(15) that an earlier answer you gave is inaccurate or
(16) incomplete, please just let me know and we can
(17) revisit that question and answer. Does that make
(18) sense?

(19) **A Yes.**

(20) Q If you don't hear part of the question
(21) that I ask, let me know and I will restate the
(22) question or I will ask the court reporter to have
(23) it read back.

(24) If you don't understand a question I
(25) have asked, please let me know and I will attempt

(1) MICHAEL BRADLEY

(2) to restate the question. And again, if you need
(3) to revisit any of your answers during this
(4) deposition, that's fine, just let me know, we can
(5) do that on the record.

(6) Do you understand these rules and
(7) instructions so far?

(8) **A Yes, Ma'am.**

(9) Q Is there any reason you cannot testify
(10) truthfully, fully and accurately here today?

(11) **A No.**

(12) Q Do you understand that you've taken an
(13) oath to tell the truth here today?

(14) **A Yes.**

(15) Q Do you understand that even though we
(16) are here over Zoom and you are in a conference
(17) room with your attorney, the oath you have taken
(18) to tell the truth here today is the same oath you
(19) would take as if you were in a court room in
(20) front of a judge?

(21) **A Yes.**

(22) Q Do you have any physical or mental
(23) condition that could keep you from testifying
(24) truthfully, fully and accurately here today?

(25) **A No.**

(1) **MICHAEL BRADLEY**

(2) Q Have you taken any sort of medication
(3) that would impact your ability to testify?

(4) **A No.**

(5) Q Have you failed to take any medication
(6) that you normally take?

(7) **A No.**

(8) Q I'm sorry if I already asked you, have
(9) you consumed any alcohol, drugs or marijuana in
(10) the last twenty-four hours?

(11) **A No.**

(12) Q You said you haven't taken any
(13) prescriptions that could impact your ability to
(14) testify; is that correct?

(15) **A Yes, nothing. I've taken nothing.**

(16) Q Understood, okay. Are you represented
(17) by an attorney today?

(18) **A Yes, Gabriel McGaha.**

(19) Q Mr. McGaha is there with you in the
(20) room, correct?

(21) **A Yes, Ma'am.**

(22) Q Did you meet with Mr. McGaha in
(23) preparation for today's deposition?

(24) **A Yes.**

(25) Q How many times?

(1) MICHAEL BRADLEY

(2) **A We met -- well, we did two Zoom**
(3) **sessions. One was a couple months ago, one was**
(4) **about two weeks ago and this past Monday, Ma'am.**

(5) Q So, three times you met him?

(6) **A Yeah, more or less, yeah.**

(7) Q Okay. Sir, other than Mr. McGaha, have
(8) you met with any other attorneys related to this
(9) lawsuit?

(10) **A No.**

(11) Q Do you have any nicknames?

(12) **A No.**

(13) Q What's your middle name?

(14) **A Bernard. I don't use it.**

(15) Q That's a perfectly fine name. Have you
(16) ever been known by any other names?

(17) **A No.**

(18) Q Where were you born?

(19) **A I was born in Manhattan, New York City.**

(20) Q Have you lived in New York City your
(21) whole life?

(22) **A No, I lived in San Antonio, Texas from**
(23) **1992 to 2000.**

(24) Q From 2000 to present, have you lived in
(25) New York City?

(1) MICHAEL BRADLEY

(2) **A Yes, Ma'am.**

(3) Q And you said you currently reside in
(4) Queens; is that correct?

(5) **A Yes, Ma'am.**

(6) Q What is your race?

(7) **A I'm white.**

(8) Q Are you married?

(9) **A Yes.**

(10) Q What is your wife's race?

(11) **A She's Puerto Rican.**

(12) Q Have you been married more than once?

(13) **A No.**

(14) Q Do you have any kids?

(15) **A Yes.**

(16) Q Are your kids white and Puerto Rican?

(17) **A Yes.**

(18) Q What race or races are your parents?

(19) **A My mother is Russian, like Slovak and my**
(20) **father is Irish.**

(21) Q They're both white, is that --

(22) **A Yes, yes.**

(23) Q Okay. Do you have any disabilities of
(24) which Fed Ex is aware?

(25) **A No.**

(1) **MICHAEL BRADLEY**

(2) Q Has Fed Ex ever had to make any
(3) disability accommodations for you?

(4) **A No.**

(5) Q Have you ever complained of any type of
(6) discrimination at Fed Ex?

(7) **A No.**

(8) Q Do you believe you have ever been
(9) discriminated against at Fed Ex?

(10) **A No.**

(11) Q Have you ever been convicted of a
(12) felony?

(13) **A No.**

(14) Q Have you ever pleaded to a felony?

(15) **A No.**

(16) Q Have you ever been on probation or
(17) parole?

(18) **A No.**

(19) Q Do you have any misdemeanor convictions?

(20) **A No.**

(21) Q Have you ever been court ordered to
(22) attend any anger management classes, drug
(23) treatment or counseling programs?

(24) **A No.**

(25) Q Have you ever sued anyone before?

(1) MICHAEL BRADLEY

(2) **A No.**

(3) Q Have you ever been sued?

(4) **A No.**

(5) Q And you understand you are not a

(6) defendant, correct, in this lawsuit?

(7) **A Yes.**

(8) Q What's your highest level of education?

(9) **A Associates Degree.**

(10) Q From which institution?

(11) **A Queensborough Community College.**

(12) Q In what area of study do you have --

(13) **A I'm sorry, I'm sorry.**

(14) Q No, no, it's fine. What area of study

(15) do you have that degree in?

(16) **A Business management.**

(17) Q Do you have any credits beyond your

(18) Associates Degree?

(19) **A No.**

(20) Q Did you graduate from high school?

(21) **A Yes.**

(22) Q Which high school?

(23) **A Long Island City High School.**

(24) Q Did you grow up in Manhattan?

(25) **A No, I was born there and then we moved**

(1) **MICHAEL BRADLEY**
(2) **to Queens when I was probably about a year old.**

(3) Q Do you have any professional degrees,
(4) licenses or certificates?

(5) A No.

(6) Q Are you currently employed?

(7) A Yes.

(8) Q Who is your employer?

(9) A Fed Ex.

(10) Q How long have you been employed by Fed
(11) Ex?

(12) A Thirty-four years.

(13) Q When you first began working for Fed Ex,
(14) what was your title?

(15) A I was a courier.

(16) Q How long did you hold that position?

(17) A Seventeen years.

(18) Q At the end of that seventeen years, did
(19) you get any promotion?

(20) A Well, it's not a promotion, it was like
(21) a lateral. I began to work at JFK as a DG
(22) specialist.

(23) Q Can you repeat that, please?

(24) A DG specialist at JFK.

(25) Q And what is a DG specialist?

(1) MICHAEL BRADLEY

(2) A They inspect all the hazardous material
(3) that comes through our system like flammable
(4) liquids, corrosives, like dry ice packages.

(5) Q When you were working at JFK though, was
(6) Fed Ex your employer? Am I understanding that
(7) correctly?

(8) A Yes, Ma'am.

(9) Q Prior to working at JFK, what location
(10) did you work at?

(11) A I was at a station in Manhattan that was
(12) when I first got hired in '89. That was AYZ
(13) Station. Then I transferred to San Antonio,
(14) Texas from '92 to 2000. That was SV -- you need
(15) the identifiers?

(16) Q Sure, yeah.

(17) A SVZA in San Antonio. And then in 2000 I
(18) came back to LGAA, the station I am at until
(19) presently.

(20) Q Then at some point did you take a break
(21) from LGAA to go to JFK?

(22) A No, I transferred to JFK I think it was
(23) 2006. That's when my son was born.

(24) Q Sorry. I'm not understanding this. So
(25) you worked at a station in Manhattan for how many

(1) MICHAEL BRADLEY

(2) years?

(3) **A Roughly three years.**

(4) Q Three years. And then you went to
(5) Texas?

(6) **A Yes, Ma'am.**

(7) Q And you were in Texas for how many
(8) years?

(9) **A Roughly eight years.**

(10) Q After Texas specifically where did you
(11) work out of, LGAA or JFK?

(12) **A LGAA until 2006.**

(13) Q What happened in 2006?

(14) **A I transferred to JFK.**

(15) Q How long did you work at JFK?

(16) **A I think it was roughly eight years.**

(17) Q What happened at the end of that eight
(18) years?

(19) **A I transferred back to LGAA because it**
(20) **was closer to home.**

(21) Q And is that the station you are
(22) currently at?

(23) **A Yes, Ma'am.**

(24) Q During your time in Manhattan, were you
(25) a courier?

(1) MICHAEL BRADLEY

(2) **A Yes.**

(3) Q In Texas, were you a courier?

(4) **A Yes.**

(5) Q When you went to LGAA until 2006, were
(6) you a courier?

(7) **A Yes.**

(8) Q Up to that point, did you have any
(9) positions other than courier?

(10) **A No, just courier then dangerous goods**
(11) **agent specialist.**

(12) Q And then a what? Sorry.

(13) **A Dangerous goods specialist.**

(14) Q Dangerous goods specialist?

(15) **A Yeah, at JFK. That's the position I**
(16) **held at JFK.**

(17) Q Okay. So you were not a courier when
(18) you were a dangerous goods specialist?

(19) **A No, no, no.**

(20) Q After you were a dangerous goods
(21) specialist at JFK you went to LGAA as what type
(22) of worker, a courier, something else?

(23) **A Courier.**

(24) Q So you went back to LGAA as a courier?

(25) **A Yes. Oh, no, I'm sorry. Sorry, sorry.**

(1) **MICHAEL BRADLEY**

(2) **Shuttle driver. I went back to shuttle driver,**
(3) **I'm sorry.**

(4) Q Shuttle driver?

(5) **A Yes, yes. Sorry.**

(6) Q That's okay. Thank you for correcting
(7) it.

(8) **A Shuttle driver, yes.**

(9) Q When you went from JFK to LGAA you
(10) entered LGAA as a shuttle driver?

(11) **A Yes, correct.**

(12) Q After shuttle driver, did you hold any
(13) other positions?

(14) **A No, I applied for manager and I got it.**

(15) Q Okay. You received a promotion,
(16) correct?

(17) **A Yes, Ma'am.**

(18) Q When did that promotion occur?

(19) **A 2018.**

(20) Q How did you obtain that promotion?

(21) **A I went -- I applied -- I did the aimed**
(22) **program and I interviewed for it.**

(23) Q What year was that?

(24) **A 2018.**

(25) Q Do you know who did your interview?

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(1) MICHAEL BRADLEY

(2) A Yes, it was Peter Manalakis (phonetic)
(3) and the HR lady, I can't remember her name. She
(4) is not with us anymore.

(5) Q Okay.

(6) A Hold on, I'm trying to remember her name
(7) for you. Hold on. Yvonne Nunez, Yvonne Nunez.
(8) It just came to me.

(9) Q Okay, thank you. How many times did you
(10) apply for that position?

(11) A Once.

(12) Q And you obtained it obviously, correct?

(13) A Yes. Yes, Ma'am.

(14) Q And you currently are in that same
(15) position at that same location; is that accurate?

(16) A Yes.

(17) Q Currently, who is your supervisor?

(18) A Eric Warnders.

(19) Q Was Eric Warnders your supervisor in
(20) 2021?

(21) A Yes.

(22) Q Was he your supervisor in 2020?

(23) A I don't recall. I know when he came in.
(24) 2020, yes, yes, he was.

(25) Q When did Eric Warnders join the LGAA

(1) MICHAEL BRADLEY

(2) station?

(3) **A That I don't know. I don't know when he**
(4) **came in.**

(5) Q Was it prior to 2020?

(6) **A Yes.**

(7) Q Has Eric Warnders been your supervisor
(8) since you became a manager?

(9) **A No.**

(10) Q Why is that?

(11) **A Peter Manalakis was the senior manager**
(12) **and he transferred to another station.**

(13) Q Did Eric Warnders replace Peter
(14) Manalakis?

(15) **A Yes, Ma'am.**

(16) Q You received the promotion in 2018,
(17) correct?

(18) **A Yes, Ma'am.**

(19) Q Are you currently in a union?

(20) **A No.**

(21) Q Have you ever been a member of any
(22) union?

(23) **A No.**

(24) Q Have you ever served in any branch of
(25) the military for any country?

(1) MICHAEL BRADLEY

(2) A No.

(3) Q Have you ever served as a member of law
(4) enforcement?

(5) A No.

(6) Q Are you a member of any groups or social
(7) clubs outside of Fed Ex?

(8) A No.

(9) Q Do you do any charity or volunteer work?

(10) A Yes, I work a CCD program at our church.
(11) I do security on Sundays.

(12) Q Sorry, you do security at the church?

(13) A Yes, yes. It's the religious
(14) instruction program, it's on Sundays. I work, I
(15) volunteer, it's 10 o'clock in the morning we go
(16) there.

(17) Q You volunteer as a security guard, is
(18) that what you are saying?

(19) A Yes, Ma'am.

(20) Q It's a Catholic church?

(21) A Yes, Ma'am.

(22) Q Any other volunteer or charity work that
(23) you do? I'm not suggesting that you should, I am
(24) just asking.

(25) A No, no.

(1) **MICHAEL BRADLEY**

(2) Q Okay. During your time working for Fed
(3) Ex, has Fed Ex ever offered training to you
(4) regarding employment discrimination?

(5) A Yes, we do it every year. We have it
(6) recurrent every year. We have to do it.

(7) Q Is it the same training every year?

(8) A More or less. It updates. Like I said,
(9) if any policy changes or anything, yes. It's
(10) more or less.

(11) Q What is the method of this annual
(12) training, is it video, lecture, training, audio?

(13) A Video.

(14) Q Approximately, how long is that video?

(15) A I really don't know, to be honest with
(16) you. We get so much training.

(17) Q What is discrimination?

(18) A Discrimination is unfair treatment of
(19) anybody according to their race, color, age, sex,
(20) disability.

(21) Q Can you define retaliation?

(22) A Retaliation is like anything from the
(23) organization -- retaliation is an organization
(24) taking actions against somebody for reporting
(25) something, you know, which they have a right to

(1) **MICHAEL BRADLEY**

(2) **do, you know, if anything is wrong, you know.**

(3) Q Right, okay. Does Fed Ex have a policy
(4) against race discrimination?

(5) **A Yes.**

(6) Q What is their policy?

(7) **A Can't quote it, it's in the manual. I**
(8) **can't quote it, but it is in there. We have a**
(9) **lot of policies.**

(10) Q Does Fed Ex have a zero tolerance policy
(11) for race discrimination?

(12) **A Yes.**

(13) Q What does that mean?

(14) **A You can't -- you can't pick on somebody**
(15) **or deny them something just because of their**
(16) **race.**

(17) Q In terms of the way Fed Ex handles those
(18) situations, what about that are you saying is
(19) zero tolerance?

(20) **A Zero tolerance is you can't deny**
(21) **somebody or take action against somebody because**
(22) **of their race.**

(23) Q Does Fed Ex terminate people who make
(24) racist comments?

(25) **MR. McGAHA: Object to form. You**

(1) **MICHAEL BRADLEY**

(2) **can answer.**

(3) **A Can you repeat the question? I'm sorry.**

(4) Q Does Fed Ex terminate people who make
(5) racist comments?

(6) **A If it's reported and you go through HR**
(7) **and the policies are violated, yes.**

(8) Q Do Fed Ex policies require that people
(9) who make racist comments be terminated?

(10) **MR. McGAHA: Object to form.**

(11) **A If it's reported, you have to act upon**
(12) **it.**

(13) Q I guess what I'm --

(14) **A All right.**

(15) Q No, I'm not trying to cut you off. Were
(16) you done with your answer?

(17) **A No, I was going to repeat what I said**
(18) **before. If something is reported to us, we have**
(19) **to go to HR and see what policies are violated**
(20) **and act upon it then.**

(21) Q Are there circumstances where someone
(22) may make a complaint of discrimination and the
(23) discrimination complaint is, for lack of a better
(24) word, substantiated or found to have occurred
(25) where Fed Ex does not necessarily terminate the

(1) MICHAEL BRADLEY

(2) wrongdoer?

(3) MR. McGAHA: Object to form.

(4) A No. Like I said, you have to put a
(5) complaint in in order for action to be taken
(6) upon.

(7) Q When you say taken action upon --

(8) A Yeah, like --

(9) Q Go ahead, I'm sorry.

(10) A No, it's okay.

(11) Q What are the different actions that Fed
(12) Ex would take in response to a complaint of
(13) discrimination that is found to have actually
(14) occurred?

(15) A You have to go through HR, you have to
(16) get statements and then you have to see what
(17) policies were violated.

(18) Q Does Fed Ex have a zero tolerance policy
(19) for violence?

(20) A Yes.

(21) Q Does Fed Ex terminate people in every
(22) instance where they have been found to have
(23) committed violence?

(24) MR. McGAHA: Object to form.

(25) A If there is violence?

(1) **MICHAEL BRADLEY**

(2) Q Yeah.

(3) A Yes.

(4) Q Is that the same for racism? What I am
(5) saying is, if someone makes a racist comment and
(6) the comment is found to have occurred, does Fed
(7) Ex terminate that person or are there other
(8) levels of discipline that Fed Ex may institute?

(9) MR. McGAHA: Object to form.

(10) A Like I said, anybody that reports, you
(11) take action, you go to HR, you see what policies
(12) were violated, then you go on from there.

(13) Q But Fed Ex does have a policy against
(14) racism and race discrimination, correct?

(15) A Yes.

(16) Q If someone does something racist or
(17) makes a racist comment and there is a complaint
(18) made against them, and Fed Ex finds that that
(19) complaint is valid, that the racist action
(20) actually happened, what are the different types
(21) of punishment or discipline that Fed Ex may take
(22) against that wrongdoer?

(23) A Like I said, HR would go over what
(24) happened and act accordingly. If it's
(25) termination, it's termination.

(1) **MICHAEL BRADLEY**

(2) Q What I am asking you is, are there
(3) circumstances where someone may be found to have
(4) committed or engaged in racism where they are
(5) subject to discipline that is not termination?

(6) A That I don't know. I don't know if that
(7) is -- I wouldn't know.

(8) Q Do the Fed Ex policies explain that?

(9) MR. McGAHA: Object to form.

(10) A I would have to look at the policy. I
(11) don't know offhand.

(12) Q Are all the Fed Ex policies written?

(13) A It's on -- you can get it online. It's
(14) in writing, but it's a manual. We get it online,
(15) the policy book.

(16) Q Does Fed Ex have any policies or
(17) practices that are not in writing?

(18) A No, everything is in the policy book.

(19) Q Okay. But you are able to tell me
(20) without looking at the policies that people who
(21) are found to have engaged in violence are
(22) terminated, correct?

(23) A That's in the acceptable conduct policy.

(24) Q Are there circumstances where someone
(25) may be had been found to have engaged in violence

(1) MICHAEL BRADLEY

(2) where they are subject to discipline that is not
(3) termination?

(4) **A I wouldn't know.**

(5) Q You said there is an employee handbook
(6) at Fed Ex; is that correct?

(7) **A Employee handbook, no, I didn't say**
(8) **that.**

(9) Q Sorry. Is there an employee handbook at
(10) Fed Ex?

(11) **A They hand them out when they first get**
(12) **hired.**

(13) Q Who are you referring to? When who gets
(14) hired?

(15) **A When an employee gets hired, they are**
(16) **given an employee handbook.**

(17) Q Does that same employee handbook apply
(18) to managers such as yourself or is there a
(19) different set of standards?

(20) **A There is no employee handbook when you**
(21) **become manager, no.**

(22) Q Is there a counter part that applies to
(23) managers? You're saying the employee handbook
(24) applies to couriers, correct?

(25) **A Couriers, handlers, service agents.**

(1) **MICHAEL BRADLEY**

(2) **Anybody other than, you know, management that's**
(3) **employed. Most times you don't get hired as a**
(4) **manager right away.**

(5) Q Why does that handbook not apply to
(6) managers, is there a separate set of rules or
(7) separate handbook that governs managers?

(8) **A No. I wouldn't know.**

(9) Q Okay. During your time as a manager,
(10) have you ever had occasion to refer to Fed Ex
(11) policies or rules? When I say refer, I mean look
(12) up?

(13) **A Yes, I look up online.**

(14) Q When is the last time you had to do
(15) that?

(16) **A I had a person with an attendance**
(17) **problem so I had to give him a warning letter.**

(18) Q When was this?

(19) **A Roughly a month ago.**

(20) Q Did you ever write Kevin Campbell a
(21) warning letter?

(22) **A No.**

(23) Q Did you ever write Kevin Campbell an
(24) OLCC?

(25) **A No.**

(1) **MICHAEL BRADLEY**

(2) Q When you worked as a courier, did you
(3) have to, as they say, split the belt?

(4) A No. I either loaded a truck or dock
(5) split, not the belt, no.

(6) Q Okay. Just to be clear, for your entire
(7) time at Fed Ex you were never responsible for
(8) splitting the belt?

(9) A I can't say that. Maybe I might have, I
(10) have been there a long time.

(11) Q Was that ever part of your regular job
(12) assignment?

(13) A Me, no.

(14) Q Okay. Is there a particular reason why
(15) that was the case?

(16) A No.

(17) Q Not every courier gets assigned to split
(18) the belt; is that accurate?

(19) A I wouldn't know. I don't really do the
(20) scheduling. They do scheduling and if they are
(21) assigned to it, that's what they are assigned to.

(22) Q Okay, got it. Have you ever been
(23) suspended from your work at Fed Ex?

(24) A No.

(25) Q Have you ever received a warning letter

(1) MICHAEL BRADLEY

(2) during your time at Fed Ex?

(3) **A No.**

(4) Q Have you ever received an OLCC at Fed
(5) Ex?

(6) **A Yes.**

(7) Q How many?

(8) **A I couldn't tell you. There's positives
(9) and there is negatives, I don't know.**

(10) Q Okay. Have you ever received negative
(11) OLCCs?

(12) **A I'm sure. I can't remember, but I'm
(13) probably sure.**

(14) Q When you say you're sure that you
(15) received negative OLCCs, is that because an OLCC
(16) is something that people -- everyone gets from
(17) time to time?

(18) **MR. McGAHA: Object to form.**

(19) **A Most of the times, it's positive. We
(20) try to keep it positive, but yes, you know,
(21) positive, negative. Like I said, I wouldn't
(22) know. I been there a long time.**

(23) Q Okay. But you do believe that you've
(24) received negative OLCCs, correct?

(25) **A Yes, I'm sure. I'm probably sure, yeah.**

(1) **MICHAEL BRADLEY**

(2) **I'm not perfect.**

(3) Q Okay. I guess that's my question.
(4) OLCCs are something that everyone at Fed Ex --
(5) basically everyone at Fed Ex will receive at some
(6) point; is that fair enough?

(7) **A Yes.**

(8) Q Okay. What's the purpose of an OLCC?

(9) **A It let's them know if they did well. If**
(10) **it's a positive, they did well. If it's a**
(11) **negative, it's areas they have to work on, could**
(12) **be attendance, could be performance, could be**
(13) **punctuality. It just let's them know where they**
(14) **stand.**

(15) Q Okay. How would you describe the work
(16) environment at Fed Ex?

(17) **A It's fine.**

(18) Q Can you offer any elaboration?

(19) **A I have no issues. I enjoy working**
(20) **there, I have no problems.**

(21) Q Do people ever say inappropriate things
(22) at work?

(23) **MR. McGAHA: Object to form.**

(24) **A Well, matters what the context is, you**
(25) **know. I couldn't tell, you know, like I said, if**

(1) **MICHAEL BRADLEY**

(2) **somebody is talking, I don't really hear much.**

(3) Q Okay. Have you ever heard Eric Warnders
(4) curse or swear?

(5) A No.

(6) Q Have you ever heard Eric Warnders say
(7) anything inappropriate or off color?

(8) A No.

(9) Q What about Henry Nunez?

(10) A No.

(11) Q Okay. Have you ever heard anyone at Fed
(12) Ex ever say anything inappropriate?

(13) **MR. McGAHA: Object to form.**

(14) A I don't know. Like I said, maybe, I
(15) don't know. I don't know. Like I said, it
(16) matters the context of it. If somebody is -- you
(17) know, the context of the conversation I walk
(18) upon, it's context.

(19) Q Have you ever heard anyone at Fed Ex
(20) joke inappropriately?

(21) **MR. McGAHA: Object to form.**

(22) A Like I said, it's the context of it. If
(23) I walk in, I wouldn't know.

(24) Q What do you mean the context of it? Are
(25) you trying to say -- what do you mean by that, by

(1) MICHAEL BRADLEY

(2) referencing the context?

(3) A I don't know what the conversation was
(4) before I got there, what they were talking about,
(5) you know, I'm not privy to it. I guess I walk by
(6) or something, I don't know what they were talking
(7) about beforehand. I don't, you know, I don't
(8) assume.

(9) Q Okay. You've said this before, you
(10) understand you are not a defendant in this
(11) lawsuit, correct?

(12) A Yes, yes.

(13) Q You understand we're here to discuss a
(14) case that Kevin Campbell filed in Federal Court,
(15) right?

(16) A Yes.

(17) Q Did you review any documents in
(18) preparation for today's deposition?

(19) A The other day.

(20) Q What documents did you review?

(21) A The allegations that pertain to me.

(22) Q Okay. Did you review those in Mr.
(23) Campbell's complaint that he filed?

(24) A Yes.

(25) Q So you reviewed his complaint, correct?

(1) MICHAEL BRADLEY

(2) **A Pertaining to me.**

(3) Q Understood. You did not review the
(4) entire complaint is what you are saying?

(5) **A No, no, absolutely, no.**

(6) Q Okay. Did you review any other
(7) documents in preparation for today?

(8) **A No.**

(9) Q Did you review any video recordings in
(10) preparation for today?

(11) **A No.**

(12) Q Have you ever reviewed any video
(13) recordings related to the incident that we're
(14) here to discuss today?

(15) **A No.**

(16) Q Did you review any audio recordings in
(17) preparation for today?

(18) **A No.**

(19) Q Are you aware of any audio recordings
(20) that depict any portion of the incident that
(21) we're here to discuss today?

(22) **A No.**

(23) Q When you reviewed that complaint, did it
(24) at all refresh your recollection about what we're
(25) here to discuss?

(1) MICHAEL BRADLEY

(2) A No. Like I said, the conversation I had
(3) with him that brought up, you know, I remember
(4) that.

(5) Q What conversation are you referring to
(6) -- go ahead.

(7) A The one where Kelvin, sorry, Kevin, he
(8) said I talked to him in the office and I was like
(9) grilling him, but I wasn't. I had a concern.
(10) You know, I like Kevin, I never had a problem. I
(11) was seeing how his well-being was after the
(12) incident with Pete Lorenzi.

(13) Q Okay. And I will show you the complaint
(14) shortly, but since you kind of mentioned it.
(15) What's your recollection of what that
(16) conversation was?

(17) A He was -- I was sitting in my office, he
(18) walked past me and I said hey, Kev, you got a
(19) second? I said I just want to check on you, how
(20) you're doing, I heard what happened, you know,
(21) people trying to be funny, they try to joke
(22) around with stupid jokes. You know, people have
(23) a stupid sense of humor. Sorry you went through
(24) that. How are you doing? Okay. I said all
(25) right, I just wanted to check on you. The

(1) **MICHAEL BRADLEY**

(2) **conversation was very short and that was it.**

(3) Q Did the conversation occur actually in
(4) your office?

(5) A **Yes, yes.**

(6) Q Do you recall whether you closed the
(7) door or asked Kevin to close the door or if the
(8) door remained open?

(9) A **I might have closed the door. I don't**
(10) **remember, to be honest with you. I don't know.**
(11) **I don't remember.**

(12) Q You said you said to him I heard what
(13) happened?

(14) A **Yeah.**

(15) Q What were you referring to?

(16) A **The comment by Pete Lorenzi calling him**
(17) **Trayvon.**

(18) Q Uh-huh.

(19) A **That's all.**

(20) Q So that -- okay. Were you present for
(21) that comment?

(22) A **No.**

(23) Q When you say you heard about it, how did
(24) you hear about it?

(25) A **I don't recall. Maybe in a manager's**

(1) **MICHAEL BRADLEY**

(2) **meeting or something. I really don't recall.**

(3) Q Uh-huh. Do you recall who was present
(4) for that management meeting where you might have
(5) heard about it?

(6) A I couldn't -- I wouldn't even know to be
(7) honest with you. I couldn't recall. I don't
(8) know.

(9) Q Were you Kevin's manager at that point?

(10) A No, never was.

(11) Q Uh-huh, okay. Who was his manager at
(12) that point?

(13) A Monty. Monty Bovell.

(14) Q Did you ever talk to Monty about that
(15) comment from Mr. Lorenzi?

(16) A No.

(17) Q Were you Mr. Lorenzi's manager?

(18) A No.

(19) Q Okay. Is there anything else -- is
(20) there anything you saw in the complaint that you
(21) outright deny ever happening?

(22) A Yes.

(23) Q Do you recall what that is?

(24) A The thing -- the comment where me and a
(25) fellow manager Steve heard a comment from David

(1) **MICHAEL BRADLEY**

(2) **Almeda towards Kevin, I don't recall that at all.**

(3) Q Uh-huh, okay. And this situation where
(4) Kevin said that Peter Lorenzi referred to him as
(5) Trayvon, do you believe that that was offensive?

(6) **MR. McGAHA: Object to form.**

(7) **A Like I said, I don't know. I wasn't**
(8) **there.**

(9) Q What was your understanding of what
(10) Kevin's complaint was in that regard?

(11) **MR. McGAHA: Object to form.**

(12) **A I said I wouldn't know. I don't know.**
(13) **I wasn't privy to discipline or anything on that.**
(14) **I just heard the comment, that's all. I don't**
(15) **know.**

(16) Q When you say you heard the comment, what
(17) did you hear?

(18) **A I just heard that Pete called him**
(19) **Trayvon, which is not funny.**

(20) Q Do you know what -- was Pete trying to
(21) make a joke?

(22) **MR. McGAHA: Object to form.**

(23) **A I don't know. I can't speak for Pete.**
(24) **I don't know.**

(25) Q Okay. What do you believe Pete was

(1) MICHAEL BRADLEY

(2) referring to when he said Trayvon?

(3) MR. McGAHA: Object to form.

(4) A I don't know. I'm not Pete. I don't
(5) know. I can't speak for Pete.

(6) Q What race is Peter Lorenzi?

(7) A I think -- I don't know if he is white
(8) or Spanish to be honest with you. I don't know.

(9) Q Is he white appearing, does he appear to
(10) be white?

(11) A He looks Spanish, too. I really don't
(12) know. He could be either white -- I really don't
(13) know, Ma'am, to be honest with you.

(14) Q Understood, fair enough. Do you know
(15) why Pete would have called Kevin Trayvon?

(16) MR. McGAHA: Object to form.

(17) A I have no idea. I don't know.

(18) Q Do you know if that was a reference to
(19) Trayvon Martin?

(20) MR. McGAHA: Object to form.

(21) A I don't know. I don't know.

(22) Q Do you know who Trayvon Martin is?

(23) A Yes, of course.

(24) Q Who is Trayvon Martin?

(25) A He was the young boy that was killed by

(1) **MICHAEL BRADLEY**
(2) **a security guard walking to a thing. He got into**
(3) **an altercation and the man shot him. It was in**
(4) **Florida.**

(5) Q Do you know the name of the person who
(6) shot him?

(7) A I don't recall.

(8) Q Your understanding of that incident is
(9) that Trayvon Martin got into an altercation with
(10) someone?

(11) A That's what I gather from it, yes.

(12) Q Do you know why the man shot Trayvon
(13) Martin?

(14) MR. McGAHA: Object to form.

(15) A I don't know.

(16) Q Do you know if he did it in
(17) self-defense?

(18) MR. McGAHA: Object to form.

(19) A I don't know.

(20) Q Do you believe that Trayvon Martin was
(21) the aggressor in that incident you just
(22) described?

(23) MR. McGAHA: Object to form.

(24) A I don't know, I have no idea.

(25) Q You did not hear Mr. Lorenzi call Kevin

(1) MICHAEL BRADLEY

(2) Trayvon, correct?

(3) A No, I didn't.

(4) Q Had you heard that, would you have taken
(5) any action?

(6) MR. McGAHA: Object to form.

(7) A Like I said, I don't know what context
(8) it was in so if it was reported to me, if he took
(9) offense to it, I would have to act upon it, but I
(10) don't know the context of it. I wasn't there.

(11) Q Assuming there was no context other than
(12) Mr. Lorenzi just calling Kevin Trayvon, is your
(13) assessment of that situation that it is racist or
(14) not racist or something else?

(15) MR. McGAHA: Object to form.

(16) A I have no idea, I don't know.

(17) Q Do you know approximately when Kevin
(18) alleged that Peter Lorenzi made this statement to
(19) him?

(20) MR. McGAHA: Object to form.

(21) A I don't know. I really don't know.

(22) Q Was it in June 2020?

(23) MR. McGAHA: Object to form.

(24) A Like I said, I don't know. I really
(25) don't know.

(1) **MICHAEL BRADLEY**

(2) Q Do you know who George Floyd is?

(3) A Yes.

(4) Q Who was George Floyd?

(5) A He was a gentleman that was apprehended
(6) by police and they choked him and they killed
(7) him.

(8) Q Do you believe the police were wrong in
(9) that situation?

(10) MR. McGAHA: Object to form.

(11) A I don't know, I wasn't there, I don't
(12) know.

(13) Q Had you ever seen anything or read
(14) anything on the news about what happened with
(15) George Floyd?

(16) MR. McGAHA: Object to form.

(17) A No, I don't know. I don't really watch
(18) TV, I don't.

(19) Q Do you get your news from any particular
(20) source?

(21) A No. To be honest with you, I don't
(22) watch the news. I work long hours, I work the
(23) p.m. shift. When I get home, I go to sleep. I
(24) really don't watch TV much at all.

(25) Q Understood, okay. Do you recall what

(1) MICHAEL BRADLEY

(2) was going on in New York City in June of 2020?

(3) **A No, I don't.**

(4) Q Do you remember Covid? Do you remember
(5) when Covid was going on?

(6) **A Covid, yeah. I don't remember when it**
(7) **started, but yeah, I remember of course.**

(8) Q You remember when Covid started, no?

(9) **A I don't recall. I really don't.**

(10) Q Okay. Do you know -- are you familiar
(11) with the Black Lives Matter movement?

(12) **A I've heard it, but no, I'm not really.**

(13) Q What's your understanding of what Black
(14) Lives Matter stands for?

(15) **A Black people to be treated equally.**
(16) **That's the more or less. I don't know.**

(17) Q Do you believe they are a hate group,
(18) Black Lives Matter?

(19) **MR. McGAHA: Object to form.**

(20) **A I don't know, I really don't know. I**
(21) **don't know.**

(22) Q Do you know whether there were protests
(23) or do you recall whether there were protests
(24) going on in the summer of 2020 in New York City?

(25) **A I don't know. I wouldn't know. I can't**

(1) **MICHAEL BRADLEY**

(2) **recall.**

(3) Q You don't remember hearing anything
(4) about that?

(5) A Like I said, I don't watch the news
(6) much. I don't watch TV much at all.

(7) Q Okay.

(8) A I don't know.

(9) Q By that same token, you can't say
(10) whether there were any riots taking place in the
(11) summer of 2020, correct?

(12) A I don't know.

(13) Q What race is Eric Warnders?

(14) A He's white.

(15) Q Do you know Nan Malabbranch (phonetic)?

(16) A Yes, of course.

(17) Q Have you ever seen her?

(18) A Yes.

(19) Q What race is Nan?

(20) A I think she's white. I'm not sure.

(21) Q What race is Henry Nunez?

(22) A He's Hispanic. He's Spanish.

(23) Q What race is -- you know James Cahill?

(24) A Yeah, yes, he's white.

(25) Q What race --

(1) MICHAEL BRADLEY

(2) **A He's white.**

(3) Q He's white?

(4) **A Yes.**

(5) Q Do you know Steve Pasqualicchio?

(6) **A Yes, he's my partner, yes.**

(7) Q What race is he?

(8) **A He's white.**

(9) Q You know someone named Rob the mechanic,

(10) right?

(11) **A Yeah, I know him.**

(12) Q What race is he?

(13) **A Rob is white.**

(14) Q Do you know Frank Ontaneda?

(15) **A Yes.**

(16) Q What race is?

(17) **A He's Spanish, Hispanic.**

(18) Q Do you know Monty Bovell? I don't know

(19) if I am pronouncing it correctly.

(20) **A Bovell, Bovell.**

(21) Q Bovell?

(22) **A Bovell, yeah, Monty Bovell.**

(23) Q You know Monty, right?

(24) **A Yes, he's not with us anymore, yes.**

(25) Q Uh-huh. What race is Monty?

(1) MICHAEL BRADLEY

(2) A He's black.

(3) Q Currently speaking, are there any black
(4) managers at the LGAA station?

(5) A Yes.

(6) Q Do you know how many?

(7) A One.

(8) Q What's his name?

(9) A I'm sorry, two. Mike Kristoff and
(10) Daniel Tyson.

(11) Q How many managers are there total at the
(12) LGAA station?

(13) A Let me count. Nine. I think it's nine.
(14) Hold on. I have to count. I'm sorry. Nine.
(15) Including Eric is ten.

(16) Q Right, okay. And then when Monty Bovell
(17) left --

(18) A Bovell.

(19) Q When he left Fed Ex, how many black
(20) managers, if any, were at the LGAA station
(21) immediately following Monty's departure?

(22) MR. McGAHA: Object to form.

(23) A After Monty left, none. Oh, one, sorry,
(24) Mike Kristoff. I keep forgetting about him. I
(25) am sorry.

(1) **MICHAEL BRADLEY**

(2) Q It's okay, I won't tell him.

(3) **A Mike Kristoff. I'm sorry.**

(4) Q It's okay, no need to apologize. So,
(5) for a while was Mike Kristoff the only black
(6) manager at the LGA station?

(7) **A Yes, Ma'am.**

(8) Q Until what was the other manager you
(9) said?

(10) **A Daniel Tyson.**

(11) Q Do you know when he became a manager?

(12) **A Danny's been a manager for like three**
(13) **years. He just transferred over to us. He's**
(14) **been with us probably about a month now.**

(15) Q Okay. Anything else you reviewed in the
(16) complaint that refreshed your recollection about
(17) what we're here to discuss today?

(18) **A Yeah, the relabelling issue.**

(19) Q Uh-huh.

(20) **A With Kevin.**

(21) Q What do you remember about that?

(22) **A Like I said, I'm a p.m. manager, I'm in**
(23) **charge of the outbound freight. We get relabels**
(24) **sometimes from the customers, you know, they have**
(25) **the wrong ship date on it and it's the courier's**

(1) MICHAEL BRADLEY

(2) responsibility when they go pick up the packages,
(3) if it has the wrong label, they're supposed to
(4) relabel it. And if packages aren't relabelled,
(5) you know, it comes back, it's supposed to be
(6) relabelled.

(7) And in Kevin's case, he brought some
(8) packages back, I said Kevin, listen, do me a
(9) favor, you gotta relabel these packages, the
(10) labels are wrong. And I gave him a scenario
(11) which I give other people, he's not the only one,
(12) I give other people. If a hundred couriers bring
(13) back ten packages, you have a thousand packages
(14) then. You have to understand the impact to the
(15) sort. And I explained it to him. You know, that
(16) was it and that was the end of that conversation.

(17) Q Did he take your instruction?

(18) A No, I think I had another conversation.
(19) He brought them back again. And I explained to
(20) him, I said Kevin, please, do me a favor, relabel
(21) this stuff, because when you go to scan it with
(22) the scanning device, it gives you a prompt if it
(23) needs a label, a new label and you label it right
(24) there and he didn't do it.

(25) Q Did he take your instruction that time?

(1) MICHAEL BRADLEY

(2) A I don't recall after that, to be honest
(3) with you. I know it was two times at least, at
(4) least. I don't recall really.

(5) Q You never wrote him an OLCC related to
(6) that?

(7) A No, absolutely not.

(8) Q Why not?

(9) A That's my style of management. I just
(10) gave him a verbal. I said listen, do me a favor,
(11) like I said, I explained to him again if a
(12) hundred couriers come in, ten packages each, it's
(13) a thousand packages. It impacts sorting, it
(14) impacts my outbound sort, that's all. That's the
(15) kind of manager I am. I spoke to him, gave him a
(16) verbal. I said do me a favor, just please, just
(17) please.

(18) Q Understand. Got it.

(19) MS. MASSIMI: We've been here
(20) about an hour. Can we take a ten
(21) minute break? It's not my
(22) intention to be here all day, but
(23) if we can take a break for ten
(24) minutes and come back, I will have
(25) about another hour.

(1) **MICHAEL BRADLEY**

(2) **(At this time, there was a pause in the**
(3) **proceeding.)**

(4) **MS. MASSIMI: Ms. Bojaryn, do you**
(5) **have the last question and answer?**

(6) **(Whereupon, the requested portion**
(7) **was read back by the reporter.)**

(8) Q Do you have an understanding of what Mr.
(9) Campbell is alleging in this lawsuit?

(10) A **Discrimination and retaliation.**

(11) Q Okay. Do you have any further idea
(12) about the specifics?

(13) A **No, just what pertains to me.**

(14) Q Understood, okay. We can just go over
(15) what pertains to you right now. Give me one
(16) second.

(17) A **Sure.**

(18) **MS. MASSIMI: Can you mark this**
(19) **as Exhibit 1.**

(20) **(Whereupon, document was marked**
(21) **as Plaintiff's Exhibit 1 for**
(22) **identification, as of this date.)**

(23) Q Mr. Bradley, I am showing you or you
(24) should now be looking at a document that we've
(25) marked today as Plaintiff's Exhibit 1 and it's

(1) MICHAEL BRADLEY

(2) the complaint in this case and at the top there
(3) should be a stamp generated by the court when we
(4) filed this that has the docket number. It says
(5) document one, the date it was filed, which is
(6) December 16th, 2022. Do you see that?

(7) **A Yes, Ma'am.**

(8) Q It's an eighteen-page document. I just
(9) want to make sure we are looking at the same
(10) thing.

(11) **A Yes, I see it, yes.**

(12) Q Okay. I just want to ask you about some
(13) of the stuff that pertains specifically to you.

(14) **A Okay.**

(15) Q Paragraph 51, can you go to that?

(16) **A I am looking at it.**

(17) Q Okay. Who is David Almeda?

(18) **A He is a courier, Ma'am.**

(19) Q What race is he?

(20) **A He's Hispanic, Spanish, Hispanic.**

(21) Q Can you please read this paragraph 51 to
(22) yourself and let me know when you're done.

(23) **A Okay, sure. Okay.**

(24) Q Have you now read the contents of
(25) paragraph 51?

(1) MICHAEL BRADLEY

(2) **A Yes, Ma'am.**

(3) Q Do you recall any aspect of the incident
(4) that is described here?

(5) **A No, I do not.**

(6) Q This incident or this paragraph alleges
(7) that David Almeda walked to where Mr. Campbell
(8) was standing with yourself and Mr. Pasqualicchio,
(9) correct?

(10) **A That's what it says.**

(11) Q That's not the part that you take issue
(12) with, right? Would Mr. Campbell have occasion to
(13) talk to you on the job?

(14) **A Like, I see him every couple of days. I**
(15) **see him, but it's more hi and bye.**

(16) Q Do you know David Almeda?

(17) **A Yes, I do.**

(18) Q Does he still work at Fed Ex?

(19) **A Yes, Ma'am.**

(20) Q Is he still a courier?

(21) **A Yes, Ma'am.**

(22) Q What type of worker is he?

(23) **A I wouldn't know, he doesn't work for me.**
(24) **He works in the -- I don't know. Honestly, I**
(25) **don't know. He might work for Hasani (phonetic).**

(1) **MICHAEL BRADLEY**

(2) Q Who is Hasani?

(3) A Ma'am, I'm having one of those moments,
(4) I had a late night, too. I forgot Hasani is
(5) black. I'm sorry. I am as tired as you are.

(6) Q No, no, that's fine. Just to be clear,
(7) are you okay to testify today?

(8) A Yes, yes.

(9) Q You are okay to testify?

(10) A Yes, yes, yes.

(11) Q Is Hasani his first name or last name?

(12) A That's his first name, Ma'am.

(13) Q Do you know his last name?

(14) A Yeah, Kennedy. Spence-Kennedy
(15) (phonetic).

(16) Q Okay. And you are saying there are
(17) three black managers at the LGAA station?

(18) A Yes, yes, Ma'am.

(19) Q Okay. Thank you for correcting that.
(20) In paragraph 51 it is alleged that in front of
(21) you and Mr. Pasqualicchio, David Almeda said to
(22) Kevin Campbell "doesn't this guy look like
(23) someone who would steal your car radio and then
(24) try to sell it back to you," correct? That's
(25) what it says?

(1) MICHAEL BRADLEY

(2) A That's what it says.

(3) Q Is it your testimony that you never
(4) witnessed nor heard that comment?

(5) A I don't recall that ever being said. I
(6) don't recall that being said at all.

(7) Q Mr. Campbell alleges that this happened
(8) around July 2020; is that correct?

(9) A I can't recall the date.

(10) Q If you look at the previous paragraph,
(11) paragraph 50, it is alleging something that
(12) happened in July 2020, correct?

(13) A Yeah, 2020, that's what it says.
(14) Paragraph 50, yes, I see it.

(15) Q And paragraph 51 starts by saying a few
(16) days after the July 2020 incident; is that
(17) accurate?

(18) A I don't recall the date, I really don't.

(19) Q Understood. Now, this statement,
(20) doesn't this guy look like someone who would
(21) steal your car radio and then try to sell it back
(22) to you, is that a racist statement?

(23) MR. McGAHA: Object to form.

(24) A I don't know the context. I don't know.
(25) If he put a complaint in saying oh, I found that

(1) **MICHAEL BRADLEY**

(2) **racist or something, you know, I don't know the**
(3) **context of it.**

(4) Q Assuming there was no context?

(5) A **Like I said --**

(6) Q What is your opinion of this statement
(7) as a Fed Ex manager? You have been there for a
(8) long career at Fed Ex.

(9) **MR. McGAHA: Object to form.**

(10) Q You know, you have experience in a
(11) managerial position, do you believe that this
(12) statement is a racist statement when made from a
(13) non-black person to a black person?

(14) **MR. McGAHA: Object to form.**

(15) A **No, no.**

(16) Q Do you believe that Mr. Campbell or do
(17) you believe that this statement is serious?

(18) **MR. McGAHA: Object to form.**

(19) A **I don't know. Like I said, I don't know**
(20) **the context of it. I wasn't there.**

(21) Q Let me it ask you this way. Mr.
(22) Campbell is claiming that this person said to him
(23) doesn't this guy look like someone who would
(24) steal your car radio, it says that, right?

(25) A **That is what it says.**

(1) **MICHAEL BRADLEY**

(2) Q I am not going to insult your
(3) intelligence, I assume you do not believe that
(4) Kevin Campbell looks like someone who would steal
(5) a car radio, correct?

(6) **MR. McGAHA: Object to form.**

(7) **A No.**

(8) Q Correct?

(9) **A Correct, no.**

(10) Q Do you want to give me any assessment of
(11) this statement?

(12) **A No.**

(13) **MR. McGAHA: Object to form.**

(14) Q Okay. But you're unable to tell me as
(15) you sit here today whether that is a racist
(16) statement as it is described here in paragraph
(17) 51?

(18) **MR. McGAHA: Object to form.**

(19) **A No.**

(20) Q No, you're not able to tell me that this
(21) is a racist statement?

(22) **MR. McGAHA: Object to form.**

(23) **A No. The context, I don't know. It**
(24) **matters what context it was in.**

(25) Q Okay. Well, if Kevin Campbell had come

(1) MICHAEL BRADLEY

(2) to you and described what happened in paragraph
(3) 51, what, if anything, would you have done in
(4) response to that complaint?

(5) **A I would have gotten a statement and like**
(6) **I say, if he put a complaint in, if he felt it**
(7) **offensive, I would get a statement from him, I**
(8) **would call HR and advise HR and they would tell**
(9) **me how to proceed.**

(10) Q Okay. Paragraph 52, it is alleged that
(11) Mr. Campbell then turned to you and Mr.
(12) Pasqualicchio and said "see, this is what I'm
(13) dealing with, you just heard David come up to me
(14) and say that." Do you see that there?

(15) **A Yeah, I'm reading it as we speak. I'm**
(16) **sorry.**

(17) Q No, take your time.

(18) **A No, that didn't happen.**

(19) Q Okay. But you see it alleged there in
(20) paragraph 52, correct?

(21) **A Yes, correct, Ma'am.**

(22) Q And it's your testimony that that never
(23) happened?

(24) **A Correct, did not happen.**

(25) Q Did Kevin Campbell ever talk to you

(1) MICHAEL BRADLEY

(2) about racism on the job?

(3) **A No.**

(4) Q Even without using the word racism, did
(5) he ever say like hey, this person is making
(6) inappropriate comments or imply that someone was
(7) making inappropriate comments to him?

(8) **A No.**

(9) Q Are there people at Fed Ex who are known
(10) as jokesters, known for joking around?

(11) **MR. McGAHA: Object to form.**

(12) **A I wouldn't -- I guess. I wouldn't know.**
(13) **You know, some people think they're funny, some,**
(14) **you know, depends on their, you know, what you**
(15) **think is funny or a jokester.**

(16) Q Having known Kevin Campbell, how would
(17) you describe his sense of humor, if any?

(18) **A I don't know. I know Kevin like hi and**
(19) **bye type of deal. He seemed like a pleasant guy.**
(20) **You know, I had no issue. He was okay. I**
(21) **wouldn't know if he is a jokester, I don't know**
(22) **him in that aspect.**

(23) Q Did you ever hear him engage in a joking
(24) behavior with or banter with other employees?

(25) **A I couldn't say, I don't know.**

(1) **MICHAEL BRADLEY**

(2) Q As far as you know, he was not known as
(3) a jokester or someone who kind of bantered with
(4) employees; is that correct?

(5) **MR. McGAHA: Object to form.**

(6) **A I don't know, I don't know him in**
(7) **that --**

(8) Q Okay. So I am assuming paragraph 53,
(9) you deny the contents of that as well?

(10) **A Yes, deny it.**

(11) Q Paragraph 54 we spoke about, right?

(12) **A Can I read it real quick, Ma'am?**

(13) Q Please, thank you.

(14) **A Yes, I read it.**

(15) Q Are the contents of paragraph 54
(16) truthful?

(17) **A No. Not the verbiage, no.**

(18) Q What about the verbiage do you believe
(19) is untruthful?

(20) **A "Do you and Pete normally joke like**
(21) **this?" And "Pete has a dark sense of humor" and**
(22) **I didn't demand anything of him. It was just a**
(23) **concern, like I said, I just wanted to see how he**
(24) **was doing, that's all it was. That's the whole**
(25) **extent of the conversation.**

(1) **MICHAEL BRADLEY**

(2) Q Why did you want to see how he was
(3) doing?

(4) A It's not, you know, I didn't appreciate
(5) what was said him. That's not, you know, I am a
(6) people person, that's not -- I don't like, you
(7) know, I just wanted to see how he was doing. You
(8) know, I felt bad.

(9) Q Okay. I mean, I am taking that at face
(10) value, I am not trying to challenge you on that.
(11) I am just trying to get more details.

(12) A I know.

(13) Q What about what was said to him did you
(14) not like?

(15) A Calling him Trayvon. You know, that's
(16) not even funny.

(17) Q But that's kind of what I was asking
(18) about before. Did you understand why Kevin
(19) thought that was offensive?

(20) A Yeah, I could see.

(21) Q Okay.

(22) A It's not funny.

(23) Q Was anyone else present for that
(24) conversation?

(25) A No, no.

(1) **MICHAEL BRADLEY**

(2) Q Do you know how long that conversation
(3) lasted?

(4) A Maybe thirty seconds, if that. It was
(5) very quick.

(6) Q Was anyone calling Kevin a snitch at any
(7) point?

(8) A I wouldn't know. I don't know any of
(9) that.

(10) Q Do you believe that Kevin is a snitch?

(11) A I wouldn't know. I don't know anything
(12) what he said. I have no idea.

(13) Q Well, I'm saying do you know him to be a
(14) snitch?

(15) A No, I wouldn't know.

(16) MR. McGAHA: Object to form.

(17) A I wouldn't know.

(18) Q Have you ever heard anyone describe him
(19) as a snitch?

(20) A No.

(21) Q Do you have an understanding of what a
(22) snitch is?

(23) A Yes.

(24) Q What's a snitch?

(25) A Snitch is if you report something and

(1) **MICHAEL BRADLEY**

(2) **somebody makes fun of you or says, you know,**
(3) **tells you that you shouldn't. More are less why**
(4) **did you say anything. I never heard anything.**

(5) Q Got it, okay. Kevin then goes on to
(6) talk about the issue with the labelling packages
(7) in paragraphs 58 and 59, do you see that?

(8) A Give me a second to read it real quick,
(9) Ma'am.

(10) Q Please, yeah. Why don't you read 58
(11) through 60 if you can.

(12) A Yeah, sure. Okay, I read it.

(13) Q Sorry, remind me again the time period
(14) that you were Kevin's manager?

(15) A I never was Kevin's manager.

(16) Q Oh, okay, right. At the time that you
(17) spoke to him in your office about Peter Lorenzi,
(18) who was his manager?

(19) A Who was Kevin's manager, Monty Bovell.

(20) Q Right, okay. Just explain this to me.
(21) Kevin alleges that you were screaming at him
(22) about not labelling packages, right? He wrote
(23) that here, you see that here, right?

(24) A Yeah, I read it, yes, Ma'am.

(25) Q You say that you had conversations with

(1) MICHAEL BRADLEY

(2) him about labelling packages, right?

(3) **A Yes, Ma'am.**

(4) Q Why were you having those conversations
(5) with him if you were not his manager?

(6) **A Because it effected my operation, that's**
(7) **why.**

(8) Q Did you ever talk to Monty Bovell or
(9) Monty about that?

(10) **A I probably did say listen, as a**
(11) **courtesy, I spoke to the guy, I just want you to**
(12) **know I spoke to him about it, that's all. That's**
(13) **as far as it went.**

(14) Q Was Kevin the only one at that time who
(15) was not labelling packages?

(16) **A Oh, no, no, there was more.**

(17) Q Were you speaking to everyone who was
(18) not doing this properly?

(19) **A Yes, yes. Like I said, I explained the**
(20) **impact to my sort, that's why I spoke to him.**

(21) Q Okay.

(22) **A And I never screamed at him.**

(23) Q Okay, that was going to be my next
(24) question. Have you ever screamed at a Fed Ex
(25) employee?

(1) MICHAEL BRADLEY

(2) A No.

(3) Q Have you ever raised your voice at a Fed
(4) Ex employee?

(5) A I probably have, but not screamed.

(6) Q Okay.

(7) A It's a loud environment out in the
(8) warehouse so sometimes you have to raise your
(9) voice.

(10) Q Okay.

(11) A Sorry, I am reading it, go ahead.

(12) Q I think that's where the allegations
(13) specifically against you end, but I want to ask
(14) you some other stuff that you were not directly
(15) involved with.

(16) Do you know if Peter Lorenzi was issued
(17) any discipline as a result of his comments to
(18) Kevin about Trayvon?

(19) A Was he disciplined?

(20) Q Yeah.

(21) A I wouldn't know. I wouldn't know about
(22) it.

(23) Q What?

(24) A I wouldn't know, he wasn't my employee.

(25) Q Can you take a look at paragraph 32.

(1) MICHAEL BRADLEY

(2) **A Thirty-two, okay, hold on a second.**

(3) **Give me a second to read it, please.**

(4) Q Yes. Paragraph 32 alleges that Lorenzi
(5) said to Campbell "why are you washing your hands
(6) for so long, is it because you're not used to
(7) having running water in the projects." Do you
(8) see that there?

(9) **A Yes, I see it.**

(10) Q Do you believe that is a racist
(11) statement?

(12) **MR. McGAHA: Object to form.**

(13) **A Like I said, I don't know the context of**
(14) **it. I wasn't there.**

(15) Q There is no context alleged here so
(16) assuming there is no context other than Lorenzi
(17) saying this to Campbell, do you believe that that
(18) is a racist statement?

(19) **MR. McGAHA: Object to form.**

(20) **A No.**

(21) Q No?

(22) **A No.**

(23) Q Do you know whether Kevin Campbell lived
(24) in the projects?

(25) **A I have no idea. I have no idea where**

(1) **MICHAEL BRADLEY**

(2) **Kevin lived.**

(3) Q Paragraph 42, can you please read that
(4) to yourself and let me know when you're done.
(5) You can read paragraphs 41 and 42 to yourself,
(6) let me know when you're done.

(7) **A Okay, sure.**

(8) Q Paragraphs 42 and 43 allege that during
(9) the summer of 2020 Rob the mechanic said to Kevin
(10) "how is your new TV?" Kevin then asked to
(11) explain what he meant and Rob said "I am talking
(12) about the TV you and your sister stole from Radio
(13) Shack this weekend during the riots." Did you
(14) read that?

(15) **A Yeah, I just read it, yes.**

(16) Q Do you believe that those are racist
(17) statements?

(18) **MR. McGAHA: Object to form.**

(19) **A Like I said, I don't know the context of**
(20) **it, I wasn't there, I don't know what was spoken**
(21) **of.**

(22) Q Assuming there was no other context
(23) other than Rob the mechanic making these
(24) statements to Kevin Campbell, do you believe that
(25) those statements are racist?

(1) MICHAEL BRADLEY

(2) MR. McGAHA: Object to form.

(3) A No.

(4) Q Do you know if there was any looting
(5) going on in New York City in the summer of 2020?

(6) A I don't recall.

(7) Q Paragraph 50, can you read that to
(8) yourself and let me know when you are done.

(9) A Yeah, sure. Okay, just finished.

(10) Q Do you see a statement quoted there?

(11) A Yes.

(12) Q Do you believe that is a racist
(13) statement?

(14) MR. McGAHA: Object to form.

(15) A Like I said, I don't know the context, I
(16) was not there, no.

(17) Q By the way, I am not accusing of having
(18) been there.

(19) A I understand.

(20) Q Assuming there's no other context other
(21) than what is stated here, do you believe that
(22) that statement is racist?

(23) MR. McGAHA: Object to form.

(24) A No.

(25) Q Do you know what type of car, if any,

(1) MICHAEL BRADLEY

(2) Kevin Campbell drove when he worked at Fed Ex?

(3) **A No, I don't.**

(4) Q Do you know whether Kevin Campbell lived
(5) with a partner or a girlfriend?

(6) **A No, I don't know anything about him.**

(7) Q Kevin Campbell no longer works for Fed
(8) Ex, correct?

(9) **A Yes, he doesn't.**

(10) Q Do you know why?

(11) **A I don't know. I don't know. I am not**
(12) **part of why he was terminated, I don't know.**

(13) Q But do you know why he was terminated?
(14) Do you know what happened?

(15) **A He got in an altercation with another**
(16) **employee.**

(17) Q Okay. What did you hear about that?
(18) Well, actually, you were not present for that,
(19) correct?

(20) **A No, no.**

(21) Q Did there come a point in time when
(22) someone told you about it?

(23) **A No, but the other employee that was**
(24) **involved worked for me.**

(25) Q Okay. And so you were not there but the

(1) MICHAEL BRADLEY

(2) other employee involved reported to you?

(3) **A Yes, Ma'am.**

(4) Q Are you referring to Augusto Alzate?

(5) **A Yes, Ma'am.**

(6) Q So, who made the decision -- Augusto
(7) Alzate was also terminated, correct?

(8) **A Yes, Ma'am.**

(9) Q Who made that decision?

(10) **A I did.**

(11) Q How did you come to that decision?

(12) **A I reviewed statements, I saw the video,
(13) I consulted with HR, security and he violated
(14) several conduct policies.**

(15) Q What type of employee was Augusto?

(16) **A He was good, he was a good employee.**

(17) Q When did you first learn about this
(18) altercation?

(19) **A The day that it happened when I came
(20) into work.**

(21) Q That day, later in the day?

(22) **A Yes, Ma'am.**

(23) Q How did you find out about it, did you
(24) read it somewhere, did someone tell you?

(25) **A No, I walked in and I was told hey,**

(1) **MICHAEL BRADLEY**

(2) **listen, Augusto was suspended and I had to**
(3) **investigate. We had to go through a whole thing,**
(4) **investigation on him. I had to go through HR,**
(5) **security, statements.**

(6) Q Who told you that initially?

(7) A **Probably someone from the management**
(8) **team.**

(9) Q Do you recall who?

(10) A **No, Ma'am, I don't.**

(11) Q Okay. Do you recall specifically what
(12) they said to you?

(13) A **They said there was an altercation**
(14) **involving Augusto and then I investigated.**

(15) Q Did they tell you it was just involving
(16) Augusto or did they tell you it was involving
(17) Kevin and Augusto? Did they give you anymore
(18) detail?

(19) A **Kevin and Augusto.**

(20) Q What did they tell you?

(21) A **There was an altercation on the belt,**
(22) **that's all.**

(23) Q That's all they told you?

(24) A **Yes, that's when I walked in.**

(25) Q What, if anything, did you do in

(1) MICHAEL BRADLEY

(2) response to that information?

(3) **A I wanted to look at the statements and**
(4) **then I talked to security and talked to HR.**

(5) Q Were you interviewed by Mr. Cahill?

(6) **A Me? No.**

(7) Q Did he record any conversations with you
(8) that you know of?

(9) **A No, Ma'am.**

(10) Q So when you say you spoke with HR and
(11) spoke with security, can you please walk me
(12) through that process?

(13) **A You review the tape, you review the**
(14) **statements and then consulted with HR and**
(15) **security and I came up with the determination**
(16) **that he had to be terminated.**

(17) Q Did you have to speak to Eric Warnders
(18) about that?

(19) **A No, I informed him of my decision.**

(20) Q What did he say?

(21) **A He said okay, that was it.**

(22) Q Did you have any conversation with Eric
(23) Warnders about this incident other than what you
(24) just described?

(25) **A No.**

(1) **MICHAEL BRADLEY**

(2) Q You didn't have any other conversation
(3) with Eric Warnders about the incident other than
(4) you telling him I have to terminate Augusto?

(5) A Yes, I was investigating and then I came
(6) to the determination that he was getting
(7) terminated and he said okay, that was it. It's
(8) my decision, he is my employee.

(9) Q You said you reviewed the tape, correct?

(10) A Yes, Ma'am.

(11) Q What did you see on the tape?

(12) A If I recall right, I saw them arguing on
(13) the belt, Augusto pushed a box over and then
(14) Kevin came into his face and then Augusto reached
(15) back and grabbed what looked like a box cutter.

(16) Q So then did you review any of the
(17) written witness statements, the written witness
(18) statements related to this?

(19) A Yeah, I read them. I read Augusto and I
(20) can't remember the other kid -- the other
(21) witness' names, to be honest with you.

(22) Q So you reviewed Augusto's written
(23) statement?

(24) A There was two other employees that were
(25) involved, that saw it.

(1) **MICHAEL BRADLEY**

(2) Q Adamel Spencer (phonetic)?

(3) A I don't recall his name.

(4) Q Jose Moreno?

(5) A No, I don't recall the names of who was
(6) there to be honest with you.

(7) Q Do you know Adamel Spencer?

(8) A Yeah, I know him.

(9) Q Do you know him to be truthful?

(10) MR. McGAHA: Object to form.

(11) A I don't know. As far as I know, I don't
(12) know.

(13) Q Do you know Kevin Campbell to be
(14) truthful, by the way?

(15) MR. McGAHA: Object to form.

(16) A No.

(17) Q Sorry, I didn't get your response. Say
(18) that again.

(19) A No.

(20) Q You don't believe he is truthful is what
(21) you are saying?

(22) A Yes, I don't believe he is truthful
(23) pertaining to the accusations against me. That's
(24) all I can speak on.

(25) Q Prior to your review or your knowledge

(1) MICHAEL BRADLEY
(2) of those accusations against you, did you believe
(3) Kevin Campbell was a truthful person?

(4) **MR. McGAHA: Object to form.**

(5) **A Like I said, I don't know, I really**
(6) **don't know.**

(7) Q Okay. What type of worker was he?

(8) **MR. McGAHA: Object to form.**

(9) **A I don't know, he didn't work for me.**

(10) Q I understand that. You can't provide
(11) any information --

(12) **A No.**

(13) Q Okay. You can't provide any information
(14) about the type of worker he was?

(15) **MR. McGAHA: Object to form.**

(16) **A No.**

(17) Q Okay. Just to go back to the
(18) investigation, did you listen to any audio
(19) recordings related to your investigation?

(20) **A No.**

(21) Q Did you speak to Monty Bovell about this
(22) incident?

(23) **A No. I did my investigation -- Augusto**
(24) **pertained to me, that's what I dealt with, just**
(25) **Augusto.**

(1) **MICHAEL BRADLEY**

(2) Q Did you ever hear any information or
(3) allegations that Augusto had hit Kevin with a
(4) box?

(5) A No.

(6) Q Did Kevin and Augusto often work
(7) together on the belt?

(8) A I don't know. I don't work the a.m.'s,
(9) I work the p.m.'s I don't know.

(10) Q Explain to me how that works then. So
(11) Augusto works for you, but you guys didn't cross
(12) paths?

(13) A No. Augusto, he went to help out in the
(14) morning to get hours, but he worked with me. He
(15) worked with my sort. I don't know how many times
(16) a week he came in the morning, but he worked in
(17) the morning to help them out. He worked for me,
(18) he reported to me, he was primarily my employee.

(19) Q You still work nights; is that correct?

(20) A Yes, yes.

(21) Q What is your typical shift?

(22) A 2 o'clock to midnight. 1 o'clock in the
(23) morning sometimes. Last night I got out close to
(24) 1:00.

(25) Q And to be clear, you are okay to testify

(1) MICHAEL BRADLEY

(2) here today, right?

(3) **A Yes, yes.**

(4) Q Would you normally be awake at this
(5) time?

(6) **A Yes.**

(7) Q In reviewing the material you just
(8) described in conducting your investigation, were
(9) you able to make a determination as to who you
(10) believed was the aggressor, if anyone?

(11) **A No, they both, you know, they got in**
(12) **each other's faces, but Augusto, I can answer on**
(13) **Augusto, because he pulled the box cutter out,**
(14) **that's automatic right there.**

(15) Q Did Augusto ever complain to you about
(16) the work he was doing on the morning shift on the
(17) belt?

(18) **A No, no, I don't know what he did. I**
(19) **don't know.**

(20) Q Did anyone ever complain to you about
(21) Kevin Campbell's work on the belt?

(22) **A I don't know, I don't work the morning.**
(23) **I can't speak for that.**

(24) Q I understand you don't work the morning.
(25) I am asking if you ever heard anything?

(1) MICHAEL BRADLEY

(2) **A No, no, no, I didn't.**

(3) Q Okay. Did you ever speak to Nan
(4) Malabbranch about the incidents Kevin Campbell
(5) alleges in the complaint?

(6) **A She called me about the incident about**
(7) **David Almeda.**

(8) Q Do you know when she called you, was it
(9) before or after Kevin's termination?

(10) **A I don't recall, Ma'am. To be honest, I**
(11) **don't recall.**

(12) Q Do you know what year that conversation
(13) was?

(14) **A I don't recall.**

(15) Q Did she call you as part of an IEEO?

(16) **A I don't know. She just called me and**
(17) **asked me about it. I don't know if it was.**

(18) Q What did she ask you?

(19) **A She just asked me more or less what's**
(20) **alleged there and she asked me is it true and I**
(21) **said no, absolutely not.**

(22) Q Did she say anything?

(23) **A No, no. That's all I recall.**

(24) Q Have you spoken to Eric Warnders about
(25) this lawsuit?

(1) MICHAEL BRADLEY

(2) A No.

(3) Q Have you spoken to Nan Malabbranch about
(4) this lawsuit?

(5) A No.

(6) Q Can you please take a look again at
(7) paragraph 50.

(8) A Okay.

(9) Q Assuming the truth of the allegation
(10) here, do you believe that Jeffrey Durante should
(11) have been terminated?

(12) MR. McGAHA: Object to form.

(13) A No, I don't know the truth, I can't
(14) speak on it. I don't know.

(15) Q What I am asking you is, the statement
(16) that's quoted here about the cage, you see that,
(17) correct? You see that there, correct?

(18) A Yes, I see it, yes.

(19) Q If you heard a Fed Ex employee making
(20) that statement, do you believe that that is a
(21) fireable offense?

(22) MR. McGAHA: Object to form.

(23) A Like I said, the context of it, I don't
(24) know what they were talking about before that. I
(25) don't know the context of it.

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MICHAEL BRADLEY

**MS. MASSIMI: Okay, I don't have
any other questions.**

MR. McGAHA: No questions.

**(Whereupon, the examination
of this witness was concluded at
11:52 a.m.)**

*** * * ***

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February 28, 2024

(1)

(2) STATE OF NEW YORK)

(3)) ss.:

(4) COUNTY OF)

(5) I have read the foregoing record

(6) of my testimony taken at the time

(7) and place noted in the heading

(8) hereof and I do hereby acknowledge

(9) it to be a true and correct

(10) transcript of same.

(11)

(12)

(13)

MICHAEL BRADLEY

(14)

(15) Subscribed and sworn to before me

(16) this ____ day of _____, 2024.

(17)

(18)

(19)

NOTARY PUBLIC

(20)

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(5)

Michael Bradley	Ms. Massimi	6-81
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CERTIFICATION

I, JOANNA BOJARYN, a Shorthand Reporter
and Notary Public of the State of New York, do
hereby certify:

That, MICHAEL BRADLEY, the witness whose
examination is hereinbefore set forth, was duly
sworn, and that such examination is a true record
of the testimony given by such witness.

I further certify that I am not related
to any of the parties to this action by blood or
marriage; and that I am in no way interested in
the outcome of this matter.


JOANNA BOJARYN

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ERRATA SHEET FOR: MICHAEL BRADLEY

MICHAEL BRADLEY, being duly sworn, deposes and says: I have reviewed the transcript of my proceeding taken on 02/28/2024. The following changes are necessary to correct my testimony.

PAGE	LINE	CHANGE	REASON
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Witness Signature: _____

Subscribed and sworn to, before me

this ____ day of _____, 20 ____.

(NOTARY PUBLIC)

MY COMMISSION EXPIRES

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